

Stuart Vardaman  
November 17, 2020

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- STUART VARDAMAN -2  
IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK3  
----- X  
ULKU ROWE,4  
Plaintiff,5  
Case No.  
6  
19 Civ. 08655 (LGS) (GWG)7  
v.8  
GOOGLE LLC9  
Defendant.10  
----- X  
DATE: November 17, 202011  
TIME: 9:37 a.m.12  
13  
14  
VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
15  
OF STUART VARDAMAN, held via Zoom, pursuant to ^  
16  
Notice, before Hope Menaker, a Shorthand Reporter  
17  
and Notary Public of the State of New York.

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2 MS. GREENE: It -- it should be in  
3 there. It's right under -- in mine at least  
4 under Exhibit 114.

5 MR. GAGE: Yeah, I see it.

6 (Whereupon, Exhibit 115 was marked at  
7 this time.)

8 Q. Do you recognize this document?

9 A. Yes.

10 Q. And what do you recognize this  
11 document to be?

12 A. I recognize it to be the draft  
13 version of the role in Kirsten's organization, the  
14 VP role --

15 Q. And --

16 A. -- the VP role.

17 Q. And is this the -- is this what you  
18 provided to Ms. Rowe?

19 A. I guess so.

20 Q. In the prior exhibit, 114, you wrote,  
21 "It sounds like she and Rob are open to 'thinking  
22 differently' about this role, so it is not  
23 necessarily a prerequisite that someone has  
24 carried a sales revenue number." What did you  
25 mean about Kirsten and Rob thinking differently

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Page not submitted in support of  
Google's motion for summary judgment

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2 network was?

3           A.       I don't recall.  
4           Q.        Do you know whether Ms. Rowe was  
5        considered or had an external reputation as an  
6        expert in this area?

7 MR. GAGE: Objection

8 A No, I don't recall.

9 Q. Do you know whether Ms. Rowe had a  
10 reputation as an industry titan, as you referred  
11 to it?

12                   A.       Compared to someone like Yolanda Pi  
13        -- Yolanda Piazza, I would say there's wide space.

14 Q. Did you know what Ms. Rowe's  
15 reputation was externally with respect to her job?

16 MR. GAGE: Objection.

17 A. No.

18 Q. Did you do anything to ascertain what  
19 her external reputation was professionally?

20 A. No, not that I recall.

21 MR. GAGE: Objection.

22 Q. Did you have any basis to compare Ms.  
23 Rowe to Ms. Piazza?

24                   A.        Aside from the publication as an  
25       example, I don't recall.

Page not submitted in support of  
Google's motion for summary judgment